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September 16, 2022

ORDER

Honorable Andre M. Espinosa U.S.M.J.
Martin Luther King Jr. Federal Bldg. and Courthouse
50 Walnut Street
Newark, New Jersey 07102

Re: United States of America and State of New Jersey *ex rel.* Rafi Khatchikian and
Ivan Torres v. Port Imperial Ferry Corporation et als
Case No: 2:16-cv-02388 (KM)(AME)

Dear Magistrate Espinosa:

Our offices represent the Plaintiffs in the above noted matter, along with Gerald Robinson, Esquire of Halunen Law. We write today requesting approval of a limited modification to the Scheduling Order (ECF 59) filed on June 28, 2022.

After conferring with all counsel, and being advised of their consent, we request a one-week extension of the time for Plaintiff to respond to the Motion to Dismiss Count 6 of the FAC, from September 16, 2022 to September 23, 2022.

ECF 59 allows Defendants to file a reply on or before October 21, 2022. Defendants are not currently requesting additional time to file the reply; however, Plaintiffs have agreed to afford additional time if needed and approved by the court.

We would respectfully request the within letter be marked "So Ordered" should the court permit the forgoing schedule modification with the understanding that, should Defendants request, a further modification of ECF 59 may be necessary.

Regardless of the requested modifications, all parties agree that the return date for the Motion to Dismiss Count 6 of November 7, 2022 can remain.

All parties are aware of the currently scheduled September 23, 2022 Status Conference call with the court.

Respectfully submitted,


MICHAEL D. FITZGERALD

SO ORDERED. Dated: September 20, 2022
/s/ André M. Espinosa
ANDRÉ M. ESPINOSA
United States Magistrate Judge